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Attorney for Gregory M. Garvin,  
Acting United States Trustee for Region 18

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON**

In re

Blue Moon Property Group, LLC,  
Debtor.

Case No. 22-31873-thp11

**STIPULATED MOTION FOR ORDER  
EXTENDING TIME FOR THE UNITED  
STATES TRUSTEE TO CHALLENGE  
DEBTOR'S ELIGIBILITY**

Blue Moon Property Group, LLC (“Debtor”) and Acting United States Trustee for Region 18, Greg Garvin (the “U.S. Trustee”), by and through his attorney Stephen P. Arnot, move this Court for an order extending the deadline through March 17, 2023 for the U.S. Trustee to file a Motion to challenge the Debtor’s eligibility to file a Subchapter V case pursuant to Fed. R. Bankr. P. 1020(b). This extension should be granted so as to avoid unnecessary litigation. The primary asset may be sold shortly and this motion unnecessary if the creditors are all paid from the sale proceeds. .

**STIPULATED MOTION FOR ORDER EXTENDING TIME FOR THE UNITED  
STATES TRUSTEE TO CHALLENGE DEBTOR'S ELIGIBILITY**

DATED this 13th day of January, 2023.

So stipulated,

GREGORY M. GARVIN  
Acting United States Trustee for Region 18

/s/ Stephen P. Arnot  
STEPHEN P. ARNOT, OSB #070765  
Assistant United States Trustee

/s/Douglas R. Ricks  
Douglas R. Ricks, OSB #044026  
Christopher N. Coyle, OSB #073501  
Of Attorneys for Debtor-in-Possession

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STATES TRUSTEE TO CHALLENGE DEBTOR'S ELIGIBILITY**